

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

-against-

**ROBERT J. MUELLER, DEEPROOT FUNDS
LLC (a/k/a dprt Funds, LLC), AND POLICY
SERVICES INC.,**

Defendants,

-and-

**DEEPROOT TECH LLC, DEEPROOT
PINBALL LLC, DEEPROOT STUDIOS LLC,
DEEPROOT SPORTS & ENTERTAINMENT
LLC, DEEPROOT RE 12621 SILICON DR LLC,
AND ROBERT J. MUELLER, JEFFREY L.
MUELLER, AND BELINDA G. BREEN, AS CO-
TRUSTEES OF THE MB HALE OHANA
REVOCABLE TRUST,**

Relief Defendants.

Civil Action No.: 5:21-cv-785-XR

AGREED MOTION TO AMEND SCHEDULING ORDER

TO THE HONORABLE COURT:

Plaintiff, Securities and Exchange Commission (“SEC”) and Defendant, Robert J. Mueller (“Mueller”) (together the “Parties”) submit this Agreed Motion to Amend the Scheduling Order along with a proposed Amended Scheduling Order.

On October 13, 2022, the Court held a status conference during which the Court lifted the partial stay of discovery set forth in the Court’s March 17, 2022 Order (ECF No. 48) and directed the Parties to submit a revised scheduling proposal (ECF No.68).

The Parties jointly submit the following recommended changes to the Court's March 29, 2022 Scheduling Order (ECF No. 52).

<u>Deadline</u>	<u>Original Date</u>	<u>Requested New Date</u>
Deadline to Amend Answer:	July 8, 2022	November 30, 2022
Close of Fact Discovery:	Not set	January 27, 2023
Plaintiff's Expert Reports:	November 18, 2022	February 20, 2023
Defendant's Expert Reports:	December 16, 2022	March 10, 2023
Rebuttal Reports:	Not set	March 31, 2023
All discovery closes:	January 27, 2023	April 7, 2023
Mediation:	January 16, 2023	April 21, 2023
Motions Deadline:	March 31, 2023	May 26, 2023
Rule 26(a)(3) Disclosures:	July 21, 2023	July 21, 2023
Objections to Rule 26(a)(3):	August 4, 2023	August 4, 2023
Joint Pretrial Order and Motions in Limine:	August 18, 2023	August 18, 2023
Final Pretrial Conference:	August 31, 2023	August 31, 2023
Jury Trial:	September 11, 2023	September 11, 2023

Date: November 9, 2022

Respectfully submitted,

/s/ David A. Nasse

David Nasse
 Kristen Warden
 Trial Counsel
 U.S. Securities and Exchange Commission
 100 F Street NE
 Washington, DC 20549
 (202) 551-4426 (Nasse)
 (202) 551-4661 (Warden)
nassed@sec.gov
wardenk@sec.gov

*Counsel for Plaintiff the Securities and
 Exchange Commission*

/s/ Jay Hulings

Jason Davis
 Jay Hulings
 Davis/Santos
 719 S. Flores Street
 San Antonio, Texas 78204
 (210) 853-5832 (Davis)
 (215) 853-5882 (Hulings)
jdavis@dslawpc.com
jhulings@dslawpc.com

Attorneys for Robert J. Mueller

CERTIFICATE OF SERVICE

I certify that on the 9th day of November 2022, a true and correct copy of the foregoing document was filed electronically through the Court's CM/ECF system, which will send copies to all counsel of record.

/s/ David A. Nasse

David A. Nasse

*Counsel for Plaintiff United States Securities
and Exchange Commission*